



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

### Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

**Facility Name:** Battle Lumber Company  
**Facility Address:** 11261 Highway 1 Bypass  
Wadley, Georgia 30477 (Jefferson County)  
**Mailing Address:** 11261 Highway 1 Bypass  
Wadley, Georgia 30477  
**Facility AIRS Number:** 04-13-163-00012

is issued a Permit for the following:

**Operation of a lumber mill, the installation of a continuous drying kiln (ID No. DK18), a 28.7 MMBtu/hr wood-fired boiler (ID No. B4) with a multiclone (ID No. MC04), and the replacement of three existing chippers (ID Nos. CH01-CH03) with one new chipper (New ID No. CH03).**

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 28592 dated October 15, 2022; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **10** pages.



Richard E. Dunn, Director  
Environmental Protection Division

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**1. General Requirements**

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

**2. Allowable Emissions**

- 2.1 The Permittee shall not process more than 71 million board-feet (MMbf) of pine lumber in all kilns, combined, during any twelve consecutive months.  
[VOC PSD Avoidance – 40 CFR 52.21 and HAP Title V Avoidance]
- 2.2 The Permittee shall not process more than 148.5 million board-feet (MMbf) of hardwood lumber in all kilns, combined, during any twelve consecutive months.  
[VOC PSD Avoidance – 40 CFR 52.21 and HAP Title V Avoidance]

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- 2.3 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart Dc - "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units," for the operation of Boilers B2, B3, and B4.  
[40 CFR 60 Subpart A and Subpart Dc]
- 2.4 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A – "General Provisions" and 40 CFR 63 Subpart JJJJJ – "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers" for the operation of Boilers B1, B2, B3, and B4.  
[40 CFR 63 Subpart A and Subpart JJJJJ]
- 2.5 The Permittee shall not cause, let, suffer, permit, or allow any emissions from equipment subject to GA Rule (b), which exhibit visible emissions, the opacity of which is equal to or greater than forty (40) percent.  
[391-3-1-.02(2)(b)1.]
- 2.6 The Permittee shall not cause, let, suffer, permit, or allow any emissions which:
- a. For fuel burning equipment less than 10 MMBtu/hr heat input— contain fly ash and/or other particulate matter in amounts equal to or exceeding 0.5 pounds per million BTU heat input.  
[391-3-1-.02(2)(d)2.(i)]
  - b. For fuel burning equipment greater than or equal to 10 MMBtu/hr heat input and equal to or less than 250 MMBtu/hr heat input— contain fly ash and/or other particulate matter in amounts equal to or exceeding the rate derived from the equation noted below:  
[391-3-1-.02(2)(d)2.(ii)]  
  
$$P = 0.5(10/R)^{0.5}$$
  
  
Where P equals the allowable PM emission rate in pounds per million BTU and R equals the heat input in millions BTU per hour.
  - c. For all fuel-burning equipment— exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six-minute period per hour of not more than 27 percent opacity.  
[391-3-1-.02(2)(d)3.]
- 2.7 The Permittee shall not cause, let, suffer, permit, or allow the emission from equipment subject to GA Rule (e), which contains particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.  
[391-3-1-.02(2)(e)1.(i)]

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- a.  $E = 4.1 * P^{0.67}$ ; for process input weight rate up to and including 30 tons per hour.
- b.  $E = 55 * P^{0.11} - 40$ ; for process input weight rate above 30 tons per hour.

Where: E = allowable emission rate in pounds per hour;  
P = process input weight rate in tons per hour.

- 2.8 The Permittee shall only fire wood in all boilers at the facility.  
[391-3-1-.03(2)(c); 391-3-1-.02(2)(g)2. (subsumed); and Georgia Air Toxics Guidelines]

**3. Fugitive Emissions**

- 3.1 The Permittee shall take all reasonable precautions to prevent fugitive dust and sawdust from becoming airborne from any operation, process, handling, and transportation or storage facility. The opacity from any fugitive dust source including but not limited to the debarkers, sawmills, log storage, any unpaved roads at the facility and the wood waste conveyors shall not equal or exceed twenty percent. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:  
[391-3-1-.02(2)(n)]
- a. Use, where possible, of water or chemicals for control of dust from all sources at the facility that is subject to this regulation including but limited to: the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
  - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
  - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
  - d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and
  - e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

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**4. Process & Control Equipment**

- 4.1 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be recorded in a permanent form suitable and available for inspection by the Division. The records shall be retained for at least two years following the date of such maintenance.

**5. Monitoring**

- 5.1 The Permittee shall perform the following applicable operation and maintenance checks and retain a record suitable for inspection or submittal for each week or portion of each week of operation of the units controlled by cyclones (ID Nos. CY01 – CY09) and the multiclones (ID Nos. MC01-MC04). A checklist or other similar log may be used for this purpose:  
[391-3-1-.02(6)(b)1.]

- a. Check exterior of unit for holes in the body or evidence of malfunction in interior of the cyclone.
- b. Check hopper for bridging and plugging.
- c. Check screw conveyor (or other particulate transfer device) for proper operation to ensure dust removal.

Any adverse condition discovered by this inspection shall be corrected in the most expedient manner possible. The Permittee shall record the incident and note the corrective action taken.

- 5.2 The Permittee shall conduct tune-ups for Boiler B1 biennially, to demonstrate continuous compliance with 40 CFR 63 Subpart JJJJJJ. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. The biennial tune-up shall include the following:  
[391-3-1-.02(6)(b)1.; 40 CFR 63.11214(b); 40 CFR 63.11223(a) and (b); and Item 6. of Table 2 to 40 CFR 63 Subpart JJJJJJ]

- a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The inspection may be delayed until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection.

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- d. Optimize total emissions of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
  - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
  - f. Maintain onsite and submit, if requested by the Division, a biennial report containing the following information:
    - i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
    - ii. A description of any corrective actions taken as a part of the tune-up of the boiler.
  - g. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.
- 5.3 Within 120 days of the initial startup of Boiler B4, the Permittee shall conduct an initial performance tune-up of Boiler B4 in accordance with the procedures described in Condition No. 5.4 of this permit. The Permittee shall submit to the Division a signed statement in the Notification of Compliance Status report outlined in Condition 7.2 of this permit, certifying that the initial tune-up has been conducted.  
[391-3-1-.02(6)(b)1.; 40 CFR 63.11214(b); and Item 14. of Table 2 to 40 CFR 63 Subpart JJJJJ]
- 5.4 The Permittee shall conduct a tune-up for each of Boilers B2, B3, and B4 every five years. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up and be conducted as specified in accordance with Paragraphs a. through g. below. The Permittee may delay the burner inspection specified in Paragraph a. and inspection of the system controlling the air-to-fuel ratio specified in Paragraph c. until the next scheduled unit shutdown, but the Permittee must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months.  
[391-3-1-.02(6)(b)1.; 40 CFR 63.11214(b); 40 CFR 63.11223(c); and Item 14. of Table 2 to 40 CFR 63 Subpart JJJJJ]
- a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary.
  - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

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- c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
- d. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- e. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- f. Maintain onsite and submit, if requested by the Division, a biennial report containing the following information:
  - i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
  - ii. A description of any corrective actions taken as a part of the tune-up of the boiler.
- g. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

**6. Performance Testing**

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
  - a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
  - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
  - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
  - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring

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devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

**7. Notification, Reporting and Record Keeping Requirements**

7.1 The Permittee shall record and maintain records of the amount of each fuel combusted in Boiler B2, Boiler B3, and Boiler B4 during each calendar month.  
[40 CFR 60.48c(g)(2)]

7.2 Within 120 days of the initial startup of Boiler B4, the Permittee shall submit to the Division a Notification of Compliance Status, signed by a responsible official who shall certify its accuracy, with the certification of compliance statement below.  
[391-3-1-.02(6)(b)1. and 40 CFR 63.1225(a)(2) and (a)(4)]

- a. "This facility complies with the requirements of Condition 5.3 to conduct an initial tune-up of Boiler B4."
- b. "This facility has had an energy assessment performed on Boiler B4 according to 40 CFR 63.11214(c)."

The notification must also be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)).

7.3 The Permittee shall prepare by March 1 of each biennial or 5-yr period, a compliance report for each of the boilers at the facility containing the following information:  
[391-3-1-.02(6)(b)1. And 40 CFR 63.11225(b)]

- a. Company name and address.
- b. Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63, Subpart JJJJJJ. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
  - i. "This facility complies with the requirements in 40 CFR 63.11223(b) to conduct a biennial tune-up of Boiler B1."
  - ii. "This facility complies with the requirements in 40 CFR 63.11223(c) to conduct a 5-year tune-up of each of Boilers B2, B3, and B4."



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- 7.4 The Permittee shall maintain the records for Boilers B1, B2, B3, and B4 as specified below.  
[391-3-1-.02(6)(b)1. and 40 CFR 63.11225(c)]
- a. As required in 40 CFR 63.10(b)(2)(xiv), the Permittee shall keep a copy of each notification and report submitted to comply with 40 CFR 63, Subpart JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.
  - b. The Permittee shall keep records to document conformance required by 40 CFR 63.11214 and 40 CFR 63.11223 as specified in this permit condition.
    - i. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
    - ii. For each boiler required to conduct an energy assessment, a copy of the energy assessment report must be kept.
  - c. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
  - d. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal use or usual manner of operation.

Records must be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action. The Permittee shall keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The Permittee may keep the records off site for the remaining 3 years.

- 7.5 The Permittee shall maintain monthly records of the amount of pine lumber processed through all of the kilns, combined, necessary to confirm compliance with the kiln throughput limit in Permit Condition 2.1. The Permittee shall also maintain monthly records of the amount of hardwood lumber processed through all of the kilns, combined, necessary to confirm compliance with the kiln throughput limit in Condition 2.2. The records shall be retained in a permanent form suitable and available for inspection or submittal to the Division upon request. These records shall be retained for at least five years following the day of record.  
[391-3-1-.02(6)(b)1.(i)]
- 7.6 The Permittee shall notify the Division in writing if the amount of pine lumber processed through all of the kilns, combined, exceeds 5.91 million board feet during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the production limit in Permit Condition 2.1.  
[391-3-1-.02(6)(b)1.(i)]

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- 7.7 The Permittee shall calculate and record, each month, a 12-consecutive month total of the amount of pine lumber processed through all of the kilns, combined, using the monthly records required in Condition 7.5. A 12-consecutive month total shall be defined as the sum of a current month's total plus the totals for the previous eleven consecutive months. The Permittee shall notify the Division if any 12-consecutive month total of pine lumber exceeds 71 million board feet. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the production limit in Permit Condition 2.1.  
[391-3-1-.02(6)(b)1.(i)]
- 7.8 The Permittee shall notify the Division in writing if the amount of hardwood lumber processed through all of the kilns, combined, exceeds 12.3 million board feet during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the production limit in Permit Condition 2.2.  
[391-3-1-.02(6)(b)1.(i)]
- 7.9 The Permittee shall calculate and record, each month, a 12-consecutive month total of the amount of hardwood lumber processed through all of the kilns, combined, using the monthly records required in Condition 7.5. The Permittee shall notify the Division if any 12-consecutive month total of hardwood lumber exceeds 148.5 million board feet. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the production limit in Permit Condition 2.2.  
[391-3-1-.02(6)(b)1.(i)]
- 7.10 The Permittee shall submit written notification of startup of new Boiler B4 and Continuous Kiln DK18 to the Division within 15 days after such date. The notification shall be submitted to:  
Mr. Sean Taylor  
Stationary Source Compliance Program  
4244 International Parkway, Suite 120  
Atlanta, GA 30354

**8. Special Conditions**

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 All Georgia Air Quality Permits previously issued to this facility, including Air Quality Permit No. 2421-163-0012-S-03-0, are hereby revoked in their entirety.  
[391-3-1-.03(2)(c)]

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- 8.3 The Permittee shall submit a completed Part 70 Operating Permit application to the Division in the approved format within 12 months after the issuance date of this permit.